



Royal Conservatoire  
*of* Scotland

# Privacy Notice: RESEARCH PARTICIPANTS

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## **RCS PRIVACY NOTICE FOR RESEARCH PARTICIPANTS**

At the Royal Conservatoire of Scotland (RCS), your privacy is important to us. This privacy notice outlines how the RCS collects and processes the personal information of our research participants. It also explains how we look after your data, why we process your data and how your data is used, stored and protected. This privacy notice will also advise you how to access your data, make changes and stay informed.

### **WHO WE ARE**

The Royal Conservatoire of Scotland is a Higher Education Institution (HEI) and a performing arts venue located in Scotland. As a data controller, the RCS will process your personal data to provide you with RCS services and to undertake its responsibilities as a HEI in Scotland. Our Data Protection Officer can be contacted at [dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk)

### **HOW WE LOOK AFTER YOUR DATA**

We will comply with all relevant data protection legislation which means your personal data will be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specific, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and up to date
5. Kept in a form which could identify individuals for no longer than is necessary and securely deleted thereafter
6. Processed in a manner that ensures appropriate security of the personal data

### **HOW WE COLLECT YOUR DATA**

We collect personal information about you in order to achieve research outcomes. We will collect and process personal information directly from you, or from an authorised third party.

### **RESEARCH AT THE RCS**

If you are participating in a research study or project led by an RCS researcher, you will typically be asked to sign a Consent Form confirming your consent to participate and be provided with specific information about the project via a Participant Information Sheet. This will provide you with information regarding the ethical procedures and safeguards of the research being undertaken. The general information published in this privacy notice is limited how your personal data will be processed and is intended to supplement the specific information in the Participation Information Sheet. Typically, this will outline:

- What data will be gathered from you, for what purpose, and by what means
- Any other organisations who are involved in the research study and who may also process your personal information, and any data-sharing arrangements
- How, and for how long, your personal data will be held by the researcher

Researchers will only collect personal information that is essential for the purpose(s) of the research, which will be fully described in the Participant Information Sheet. Typically, personal information is anonymised soon after data collection so that individuals cannot be recognised and your privacy is protected. If at any point your personal information is to be used in an un-anonymised format, your consent to share will always be sought.

## HOW YOUR DATA IS USED

Below we provide the purpose of processing your data and the lawful basis:

<b>Research in the Public Interest</b>	
Description of processing	<p>As a publicly funded HEI, we may use personal information from people who have agreed to take part in RCS research in order to carry out that academic research in the public interest.</p> <p>When the research partners for a research study or project are not publicly funded, we will process your personal information in order to complete our academic research only when we have demonstrated that there is legitimate interest to do so that does not override your interests, rights and freedoms.</p>
Lawful Basis	<b>Public Task or Legitimate Interest</b>

Note: we do not use the lawful basis of **consent** to process your personal data for research purposes. However, our researchers will ask for your **consent to participate** in the research; you can withdraw your consent to participate at any time, as well as the consent to share explained above.

## WHAT DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. For research purposes the personal data will typically be either anonymised or pseudonymised.

Research study requirements and objectives may vary considerably. Therefore, the types of personal information collected and used will depend on the particular study. Before the study begins, the researchers will inform you which types of personal information are required for their particular study in the Participant Information Sheet and/or the 'consent to participate' process.

## SPECIAL CATEGORY DATA

The research study may also collect and process certain "special category" data that you provide us, such as biographical, educational or health information. If this is required, we will process this special category of personal data lawfully under the processing condition of archiving, research and statistics.

If we collect special category data about you, we will justify the need and have appropriate data processing safeguards in place to allow us to process and store that data securely.

### **IF YOU DO NOT PROVIDE US WITH PERSONAL INFORMATION**

If you do not provide us with the personal information we ask for, we may not be able to include you in the research study.

### **PROTECTING YOUR PERSONAL INFORMATION**

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, accessed, altered or disclosed in an unauthorised way. We limit access to your personal information to those researchers and third parties who need to access your data. This applies equally to paper and electronic records. We have in place procedures to deal with any security breaches and will notify you and the regulator of any suspected breaches where we are legally required to do so. Further information can be found in our [Data Protection Policy](#).

### **DATA SHARING**

We may share your personal data with approved third parties, such as research partners and data analysts.

All our third party service providers are required to afford you the same level of personal information data security as the RCS. These third parties will only process your information at our instruction and that processing will be limited to the agreed specified purposes, such as:

- Sharing with stated research partners such as other Higher Education institutions who are partnering with the RCS to undertake the research
- For a research study by a student, the research and personal data may be shared with the student's supervisor(s) and assessors.
- Personal data may be shared for a limited time with software partners to process and conduct analysis of the information provided
- For the auditing of the specific research study
- To allow complaints about research to be investigated

Research study outcomes are typically communicated to the public and to the academic community using anonymised data only: where is this not the case the researcher will ask for specific consent to share beforehand.

In the case of research involving children or vulnerable adults, the researcher may need to share personal information where they have a reasonable concern around the safety of the research participant. In such cases, the safety of the participant is considered more important than the assurance of confidentiality and/or anonymity offered by data protection laws. All instances of research involving children or vulnerable adults will include information about safeguarding disclosure in the participant information sheet and the consent to participate form.

## HOW LONG WILL WE HOLD YOUR PERSONAL INFORMATION

We will only retain your personal information for as long as it is necessary to fulfil the purposes for which we collected it and to fulfil any legal, financial, accounting or reporting requirements. Information about how long we retain your personal information that was collected for a research study will be provided on the Participant Information Sheet and on the RCS Record Retention Schedule can be found on the RCS website in our [Freedom of Information Publication Scheme](#)

## COOKIES

RCS uses cookies on our website(s) to track visitor interactions. We then use the information to compile reports and to help us improve our websites. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. You can find our [Cookie Policy](#) online.

## YOUR RIGHTS

You have a range of rights under data protection legislation. You have the right to:

- **Be informed:** about the collection and use of your data
- **Access:** your personal information (commonly known as a "subject access request")
- **Rectification:** if information we hold about you is wrong, please ask us to correct it
- **Restrict Processing:** you have the right to ask us to restrict or suppress the processing of your information

The following rights apply only in certain circumstances:

- **Object:** to our processing where we rely on a legitimate interest (or those of a third party) and you object
- **Erasure:** you can ask us to delete information about you
- **Data portability:** allows you to move, copy or transfer your data easily from one IT environment to another

Any visitor can exercise their rights as outlined above by contacting [dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk). You will receive a response from the RCS within 30 days.

## CONTACT US

Please get in touch with us if you have any questions about any aspect of this Privacy Notice, and in particular if you would like to exercise any of your rights as outlined above.

We can be contacted at:

### Data Protection Officer

Royal Conservatoire of Scotland,  
100 Renfrew Street, Glasgow, G2 3DB

[dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk)

## **COMPLAINTS**

If you are not satisfied with the way in which your Data Protection request has been dealt with, you are entitled, in the first instance, to submit a complaint to us. Should you wish to complain, please contact us at [dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk) and we will, without undue delay, take appropriate steps to review and respond to your complaint.

If you are dissatisfied with our response, you have the right to complain directly to the Information Commissioner's Office via their website: <https://ico.org.uk/make-a-complaint/>